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*Dr. Reddy's Laboratories, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DR. REDDY'S LABORATORIES,  
INC.,

Plaintiff,

v.

AMARIN PHARMA, INC., AMARIN  
PHARMACEUTICALS IRELAND  
LIMITED, AMARIN CORPORATION  
PLC,

Defendants.

Civil Action No. 3:21-cv-10309  
(RK)(TJB)

**CERTIFICATION OF FRANK D. RODRIGUEZ IN SUPPORT OF**  
**MOTION TO SEAL**

I, Frank D. Rodriguez, Esq., of full age, hereby certify as follows:

1. I am an attorney at Windels Marx Lane & Mittendorf, LLP, licensed to practice law in the State of New Jersey, and counsel for Plaintiff Dr. Reddy's Laboratories, Inc. ("DRL") in the present action.

2. I make this Certification on my personal knowledge and documents made available to me. I am fully familiar with the facts set forth herein as well as the categories and types of information that DRL keeps confidential. I am also familiar with the harm that DRL would sustain if its confidential information described below were to become public.

3. I submit this Certification in support of the motion to seal DRL's First Amended Complaint and its attached Exhibit 1 filed July 1, 2024, and specifically those portions that contain confidential information. *See* ECF No. 163.

4. In support of the motion to seal, a Local Civil Rule 5.3(c)(3) Index has been prepared identifying those portions of the First Amended Complaint containing information that DRL seeks to seal. I have reviewed the Index and am familiar with the information DRL has identified as confidential and which it seeks to seal. This Court issued an order on January 19, 2024, sealing the same material. *See* ECF No. 145. There is no party or nonparty known to object to the sealing request.

5. This is a commercial antitrust dispute involving confidential information that DRL has a legitimate interest in protecting because its

competitors in the marketplace could utilize the non-public information to gain an unfair advantage over DRL to its detriment. In particular, DRL has redacted confidential business communications and arrangements with its suppliers and details of Defendants' activity with respect to those suppliers that led to the injury to DRL giving rise to this action.

6. The confidential information that is the subject of this motion includes DRL's nonpublic and highly sensitive business information. In particular, DRL redacted confidential business communications and arrangements with its suppliers and details of Defendants' activity with respect to those suppliers that are very sensitive in the context of this action. Without such redactions, third parties could access confidential commercial communications and arrangements with those suppliers to DRL's detriment.

7. There is no less restrictive alternative other than sealing the requested portions of the First Amended Complaint and Exhibit 1 thereto, so that the Parties may use the information to advocate for their respective positions in this litigation while protecting DRL's nonpublic confidential information. DRL has only redacted specific portions of the First Amended Complaint that contain actual confidential information.

8. Proposed redacted versions of the First Amended Complaint and Exhibit 1 are attached as exhibits to the Parties' Joint Motion to Seal.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 15, 2024

Respectfully submitted,

/s/ Frank D. Rodriguez

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